

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

STATE OF TEXAS, *et al.*, §
§
Plaintiffs, §
§
v. § Case No. 1:18-CV-68
§
UNITED STATES OF AMERICA, *et al.*, §
§
Defendants, §
§
and §
§
KARLA PEREZ, *et al.*, §
§
Defendant-Intervenors, §
§
and §
§
STATE OF NEW JERSEY, §
§
Defendant-Intervenor. §

**DEFENDANT-INTERVENORS'
UNOPPOSED MOTION TO WITHDRAW ERNEST I. HERRERA AS COUNSEL**

Defendant-Intervenors Karla Perez, *et al.*, respectfully move to withdraw Ernest I. Herrera as an attorney in this case. Mr. Herrera will be ending his employment with the San Antonio Mexican American Legal Defense and Educational Fund (MALDEF) office on January 3, 2020. His withdrawal will not cause undue delay and will not adversely affect the interests of Defendant-Intervenors Karla Perez, *et al.*

Defendant-Intervenors Karla Perez, *et al.*, will continue to be represented by Attorney-in-charge, Nina Perales (MALDEF), Douglas H. Hallward-Driemeier (Ropes & Gray), Carlos Moctezuma García (García & García Law Firm).

For these reasons, Defendant-Intervenors Karla Perez, *et al.*, respectfully request leave to withdrawal Ernest I. Herrera as counsel in this case.

Dated: August 31, 2020

Respectfully submitted,

**MEXICAN AMERICAN LEGAL
DEFENSE AND EDUCATIONAL FUND**

By: /s/ Nina Perales
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Attorneys for Defendant-Intervenors

CERTIFICATE OF CONFERENCE

I, the undersigned, hereby certify that, on August 28, 2020, I emailed counsel of record for all parties. Plaintiff States and Defendant-Intervenor New Jersey do not oppose the motion. Federal Defendants did not respond.

/s/ Ramon A. Soto
Ramon A. Soto

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that, on August 31, 2020, I electronically filed the above and foregoing document using the CM/ECF system, which automatically sends notice and a copy of the filing to all counsel of record.

/s/ Nina Perales
Nina Perales

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**[PROPOSED] ORDER
GRANTING UNOPPOSED MOTION**

On this date, the Court considered Defendant-Intervenors' unopposed Motion to Withdraw Ernest I. Herrera as Counsel.

Having considered the Motion, the Court is of the opinion that the Motion should be GRANTED.

IT IS THEREFORE ORDERED that Defendant Intervenors' Unopposed Motion to Withdraw Ernest I. Herrera as attorney in this case is hereby GRANTED. The clerk is instructed to remove Mr. Herrera from further electronic notifications for this case.

Signed on _____, 2020.

HON. ANDREW S. HANEN
UNITED STATE DISTRICT JUDGE